

EXHIBIT 1

In the Matter Of:

IN RE LTL Management LLC

ADAM PULASKI

April 15, 2023



IN RE LTL Management LLC

Confidential

Adam Pulaski
April 15, 2023

1

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEW JERSEY

3

4 In Re: Chapter 11

5 LTL MANAGEMENT, LLC, Case No. 23-12825 (MBK)

6 Debtor.

7 _____ /

8 ORAL VIDEOTAPED DEPOSITION

9 ADAM PULASKI

10 APRIL 15, 2023

11 "CONFIDENTIAL"

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13

14 Oral sworn videotaped deposition of
15 ADAM PULASKI, taken remotely, before Patricia R.
16 Frank, Registered Merit Reporter, Certified
17 Realtime Reporter, and Notary Public, commencing
18 at 9:40 a.m. EDT, on the above date.

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25 Lexitas Job No. 892935

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2 (All parties appearing remotely)

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1 (Appearances cont'd.)

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1 (Appearances cont'd.)

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1 (Appearances cont'd.)

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20 ALSO PRESENT:

21 JIM MURDICA

22 KENNETH ROSEN

23 LISA NATHANSON BUSCH

24 TRACY HUGHES

25 MIGUEL CONCEPCION, Videographer

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Witness

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(Exhibits attached to transcript

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in hard copy format and/or electronically.)

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Marked for I.D.

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Exhibit 1 Plan Support Agreement

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1 THE VIDEOGRAPHER: Good
2 morning. We are now on the record. Today's
3 date is April 15, 2023, and the time is
4 9:40 a.m. Eastern Time. This is the video
5 deposition of Adam Pulaski in the matter of
6 In Re: LTL Management, LLC Bankruptcy, filed
7 in the United States Bankruptcy Court,
8 District of New Jersey, 23-12825 (MBK). This
9 deposition is taking place via web video
10 conference with all participants attending
11 remotely.

12 My name is Miguel Concepcion.
13 I'm the videographer representing Lexitas.
14 All appearances will be noted on the
15 stenographic record. Our court reporter
16 today is Patricia Frank representing Lexitas.
17 The court will now swear in the witness.

18 - - -

19

20 ADAM PULASKI,
21 having been duly sworn, was examined and
22 testified as follows:

23 - - -

24 THE VIDEOGRAPHER: Counsel, you
25 may proceed.

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1 MR. HADDAD: Thank you.

2 BY MR. HADDAD:

3 Q. Good morning, Mr. Pulaski. I'm
4 Richard Haddad from Otterbourg, and we are
5 proposed counsel for the Official Committee
6 of Talc Claimants in the LTL bankruptcy.

7 Can you hear me this morning,
8 sir?

9 A. Yes.

10 Q. Sir, is there anyone present in
11 the room with you?

12 A. No.

13 Q. And where are you physically
14 located?

15 A. In my office in Houston, Texas.

16 Q. Sir, is there any reason that
17 you are unable to testify completely and
18 truthfully this morning?

19 A. No.

20 Q. Are you represented by counsel
21 this morning?

22 A. Yes. John Black.

23 Q. Is anyone other than you or
24 your firm paying for Mr. Black's
25 representation?

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1 A. No.

2 Q. Sir, prior to the October 14,
3 2021 bankruptcy filing of LTL, how many talc
4 cases against Johnson & Johnson or LTL had
5 you filed in court?

6 A. I don't know the answer to that
7 question.

8 Q. Had you filed any cases in
9 court against Johnson & Johnson or LTL for
10 talc prior to October 14, 2021?

11 A. Had I personally filed them?

12 Q. You as counsel of record.

13 A. As counsel of record, I don't
14 know the answer to that question. It may be
15 that they were before or maybe they were
16 after. I think there were some before.

17 Q. Approximately how many before,
18 sir?

19 A. I don't know the answer to that
20 question. I would guess that it would be I
21 think somewhat less than 50.

22 Q. As of the bankruptcy filing of
23 LTL in October of 2021, did you have talc
24 clients with claims against Johnson & Johnson
25 retained by your firm who had not yet filed

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1 in court?

2 A. Yes.

3 Q. And how many?

4 A. Several thousand. And --

5 Q. I'm sorry. Go ahead, sir.

6 A. Go ahead. Well, there are

7 several thousand other claims that I

8 co-counseled with -- for instance, with

9 Beasley Allen that had been filed prior to.

10 Q. And did you personally have
11 retention letters signed by the clients in
12 those several thousand cases with Beasley
13 Allen?

14 A. Yes.

15 Q. And did Beasley Allen similarly
16 have signed retention letters with each of
17 those clients?

18 A. Yes.

19 Q. And with respect to those
20 clients with which you were co-counsel with
21 Beasley Allen, are you still counsel for
22 those clients?

23 A. Yes. As well as other firms.

24 Q. How many talc clients do you
25 presently have with claims against Johnson &

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1 Johnson or LTL?

2 A. Including claims that I have
3 with myself and with co-counsel?

4 Q. Let's start there.

5 A. Over 10,000.

6 Q. How many do you have with
7 yourself without co-counsel?

8 A. I believe it's around 6,000.

9 Q. For those 6,000 claims that you
10 have for yourself without co-counsel, how
11 many of those had filed lawsuits against
12 Johnson & Johnson or LTL prior to October 14,
13 2021?

14 A. Well, let's be clear. Some of
15 those I do have co-counsel but I'm lead
16 counsel so -- but I would say less than 50.

17 Q. Are you presently with a law
18 firm?

19 A. Yes.

20 Q. And which law firm is that?

21 A. Pulaski Kherkher.

22 Q. And for how long have you been
23 affiliated with that law firm?

24 A. With this name?

25 Q. Yes.

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1 A. Three or four years. I can't
2 remember exactly.

3 Q. So since prior to October 14,
4 2021.

5 A. So two years prior to 2021.

6 Q. With respect to the
7 approximately 6,000 clients that you -- that
8 we were just discussing, are the retention
9 agreements with you personally or with your
10 law firm?

11 A. Law firm.

12 Q. With respect to those
13 approximately 6,000 clients, how many of
14 those have you personally met?

15 A. I've probably met a few by
16 Zoom.

17 Q. Have you met any in person?

18 A. Probably one or two.

19 Q. When did you meet those two
20 that were -- one or two in person?

21 A. I can't tell you, because when
22 we have clients that are in Houston,
23 oftentimes they come into the office and ask
24 to meet and I meet with them.

25 Q. Of the 6,000 -- approximately

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1 6,000 clients, how many of those have you
2 personally spoken with on the telephone?

3 A. Hundreds.

4 Q. So there would be at least
5 5,000 that you have never spoken with on the
6 telephone?

7 A. Personally?

8 Q. Yes, sir.

9 A. Correct.

10 Q. Of the 6,000 -- approximately
11 6,000 clients, how many of them have met
12 personally with attorneys from your law firm?

13 A. Can't answer that question. I
14 don't know the answer to that question.

15 Q. Do you know whether all of them
16 have?

17 A. No.

18 MR. BLACK: Object to form.

19 BY MR. HADDAD:

20 Q. Of the 6,000 clients that you
21 presently have, how many were retained in
22 2023?

23 A. Maybe a few hundred.

24 Q. How many were retained in 2022?

25 A. I don't know the answer to that

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1 question, but I can get it to you. I would
2 say less than 500 probably. Maybe less than
3 that.

4 Q. How many were retained after
5 the LTL bankruptcy filing on October 14,
6 2021, in the balance of '21?

7 A. I would -- I don't know the
8 answer to that question. I'd have to
9 research it and find out for you.

10 Q. Do you know the diagnosis for
11 all of your talc -- 6,000 talc clients?

12 A. No. Do I personally know the
13 diagnosis? No.

14 Q. Do you know whether any other
15 attorney in your firm knows the diagnosis for
16 all of your 6,000 clients?

17 A. For all of the clients? No.
18 And I believe the answer is probably no.

19 Q. Does your firm have medical
20 records with respect to all 6,000 of your
21 clients?

22 MR. BLACK: Objection.

23 THE WITNESS: All of them?

24 MR. BLACK: I don't think he
25 can answer that. It's privileged. What

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1 documents he has for individual clients is
2 privilege.

3 MR. HADDAD: I wasn't asking
4 for any individual client. I was asking for
5 all the clients.

6 MR. BLACK: I understand.

7 That's really a distinction without a
8 difference.

9 MR. HADDAD: I don't think it
10 is. Are you instructing him not to answer,
11 sir?

12 MR. BLACK: I am, sir.

13 MR. BLOCK: Hold on. Hold on a
14 second. John Black, how are you? Jerry
15 Block from Levy Konigsberg.

16 MR. BLACK: Hi, Jerry.

17 MR. BLOCK: This is a really
18 critical point, and I could tell you we've
19 been on the phone with the judge about
20 discovery. The judge is very interested in
21 understanding whether there is real support
22 from confirmed talc claimants supporting the
23 bankruptcy plan, and it's going to be really
24 important that we're allowed to know for how
25 many of Pulaski's clients that are being

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1 called talc clients you guys have some
2 confirmation or not that the person has
3 either mesothelioma or ovarian cancer.

4 So that's a really important
5 point. We don't think it's privileged. I'd
6 ask you to consider that as we move on today,
7 okay?

8 MR. BLACK: Jerry, I appreciate
9 the comments. And if the Court finds that my
10 objection is inappropriate, you'll get the
11 information that you need.

12 MR. BLOCK: All right. Are you
13 an attorney with the Pulaski firm or another
14 firm?

15 MR. BLACK: No. Daly & Black.

16 MR. BLOCK: Okay. So the
17 Pulaski firm is not going to -- is not going
18 to provide information about whether any of
19 its 6,000 clients have a confirmed diagnosis
20 of ovarian cancer or mesothelioma absent a
21 court order?

22 MR. BLACK: He's not going to
23 answer that question, the one posed by
24 Mr. Haddad. That's the limited basis of my
25 instruction.

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1 MR. BLOCK: All right. So
2 we'll ask more questions and we'll see where
3 it goes. Thanks.

4 MR. BLACK: Understand.

5 BY MR. HADDAD:

6 Q. Prior to April 4, 2023, did you
7 personally take any steps to verify the
8 medical condition of your 6,000 clients?

9 A. No.

10 Q. Prior to April 4, 2023, did
11 anyone from your --

12 A. I'm sorry. Are you saying
13 prior to or -- I can't understand what you're
14 saying. Sorry. Maybe it's the phone.

15 Q. Sure. I'll ask it again.

16 Prior to April 4, 2023, did you
17 personally take any steps to verify the
18 medical condition of your 6,000 talc clients?

19 MR. BLACK: So, same objection.
20 What was personally done on individual files
21 is privileged.

22 MR. HADDAD: Yeah. I was just
23 asking for a yes or no question as to whether
24 anything was done. I wasn't asking
25 specifically as to what was done. So I don't

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1 believe that your objection is well-founded,
2 counsel. I ask you to reconsider.

3 MR. BLACK: I understand. But
4 what a lawyer does on a docket of cases or
5 individual cases is privileged, so ...

6 MR. HADDAD: So you're
7 instructing him not to answer that question,
8 sir?

9 MR. BLACK: I am.

10 BY MR. HADDAD:

11 Q. Sir, do you know what type of
12 cancer, if any, your 6,000 clients have?

13 MR. BLACK: I think he answered
14 that.

15 MR. BLOCK: No, he didn't.

16 Re-ask it and ask for an answer.

17 MR. HADDAD: Sure.

18 MR. BLACK: And I would ask
19 that we have one examiner, one person, asking
20 questions at a time if that's okay?

21 MR. HADDAD: Yeah, I think
22 that's -- I think that's fair. And I'm going
23 to move forward, and Mr. Block will have his
24 chance. I'd ask the reporter to kindly read
25 back the last question.

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1 (The court reporter read back
2 the question as follows: "Sir, do you know
3 what type of cancer, if any, your 6,000
4 clients have?")

14 BY MR. HADDAD:

15 Q. Have you looked at their files,
16 every clients' files, ever, sir?

17 MR. BLACK: Objection. Don't
18 answer that.

19 MR. HADDAD: Well, he just told
20 me he hasn't looked at them today, yesterday,
21 or within the past week so I was --

22 MR. BLACK: I'm just objecting
23 to the question. I can't always object to
24 what a witness says.

25 MR. HADDAD: No. I'm

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1 suggesting that I believe the -- to the
2 extent there is a privilege, which I don't
3 think there is on that question, it would
4 have been waived by the witness' answer --

5 MR. BLACK: I'm not waiving it.

6 MR. HADDAD: -- to the prior
7 question.

8 MR. BLACK: I've objected.

9 MR. HADDAD: Are you
10 instructing him not to answer that, sir?

11 MR. BLACK: I am. There's no
12 waiver if I object.

13 BY MR. HADDAD:

14 Q. Sir, how many of your 6,000
15 talc clients used Johnson & Johnson talc
16 products?

17 A. My understanding is all of
18 them.

19 Q. And what steps, if any, did you
20 take to verify that?

21 A. Personally or my firm?

22 Q. Well, let's start with you
23 personally.

24 A. Personally I put processes in
25 place in the office to handle certain aspects

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1 of our clients' claims.

2 Q. And what processes were in
3 place -- let me start again.

4 What processes were in fact
5 undertaken with respect to each of your 6,000
6 talc clients to verify that they each used
7 Johnson & Johnson talc products?

8 MR. BLACK: Don't answer that
9 question. It's privileged.

10 BY MR. HADDAD:

11 Q. Do any of your 6,000 talc
12 clients have lawsuits against manufacturers
13 other than Johnson & Johnson in connection
14 with their cancer?

15 A. Not that I'm aware of.

16 MR. BLACK: If you know.

17 THE WITNESS: Not that I know
18 of.

19 MR. HADDAD: Sir, I think every
20 question is an "if you know" question. I'm
21 confident the witness is sufficiently aware
22 to be able to answer questions, if he knows,
23 and to state that he doesn't know if he
24 doesn't know, and he can do that without
25 prompting from his counsel.

1 BY MR. HADDAD:

2 [REDACTED]

20 Q. In what matters other than

21 Johnson & Johnson talc claims have you had

22 dealings with Mr. Murdica?

23 A. Claims related to the ingestion

24 of Invokana with claims related to a medical

25 device called Attune.

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1 Q. Anything else?

2 A. Currently a claim that is
3 ongoing litigation, Elmiron.

4 Q. How many clients do you have in
5 connection with the Elmiron matters?

6 MR. BLACK: You don't need to
7 answer that. This is about talc, right?

8 BY MR. HADDAD:

9 Q. Sir, can you please answer the
10 question?

11 MR. BLACK: Don't answer the
12 question. It's irrelevant. It's harassing.
13 This is outside the bounds of, as I
14 understand it, the purpose of this
15 deposition. What other cases he has, other
16 dockets and dealings, is not the basis of
17 this examination.

18 MR. HADDAD: Sure. I think the
19 relations that he has with Mr. Murdica and
20 all other representatives of Johnson &
21 Johnson and LTL are squarely in the middle of
22 this case and --

23 MR. BLACK: I hear you.

24 MR. HADDAD: -- and I don't
25 believe, sir, that objections to relevance

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1 are an appropriate instruction not to answer,
2 particularly given the witness' testimony up
3 to this point.

4 MR. BLACK: Harassing is. I
5 mean, I let you ask a couple questions. It's
6 privileged. What he does on other dockets --

7 THE COURT REPORTER: Sorry.

8 One at a time, please.

9 MR. BLACK: -- is privileged.
10 Other kinds of cases, other dockets, that's
11 not what we're here to talk about today.

12 MR. HADDAD: Sir, I didn't ask
13 what he does. I asked how many clients.
14 That's for a different question.

15 MR. BLACK: It is a different
16 question but it's still privileged. It's
17 proprietary to him. What he's doing on those
18 cases that are not talc is really not the
19 subject of this examination.

20 BY MR. HADDAD:

21 Q. Have you filed Elmiron cases in
22 court?

23 MR. BLACK: Don't answer that.
24 That's also public if you want to go find
25 them, but it's privileged. Well, if it's

30

1 public, it's by definition not privileged,
2 sir. I'm going to instruct you not to
3 answer.

4 (Court reporter clarification.)

5 MR. HADDAD: Counsel, I'd ask
6 you not to speak over me. Thank you.

7 MR. BLACK: I don't think I
8 have.

9 MR. HADDAD: If something is
10 filed in a court, by definition, it's not
11 privileged. Are you insisting that that
12 question is privileged?

13 MR. BLACK: I'm telling you
14 that the actions he takes for other clients
15 on other cases, whether it's filing or
16 picking up the phone, is privileged. If you
17 want to get the filings, those are public.

18 MR. HADDAD: I didn't ask about
19 picking up the phone. I asked about a
20 number. That was the extent of my question,
21 sir.

22 MR. BLACK: I understand.

23 MR. HADDAD: Okay.

24 BY MR. HADDAD:

25 [REDACTED]

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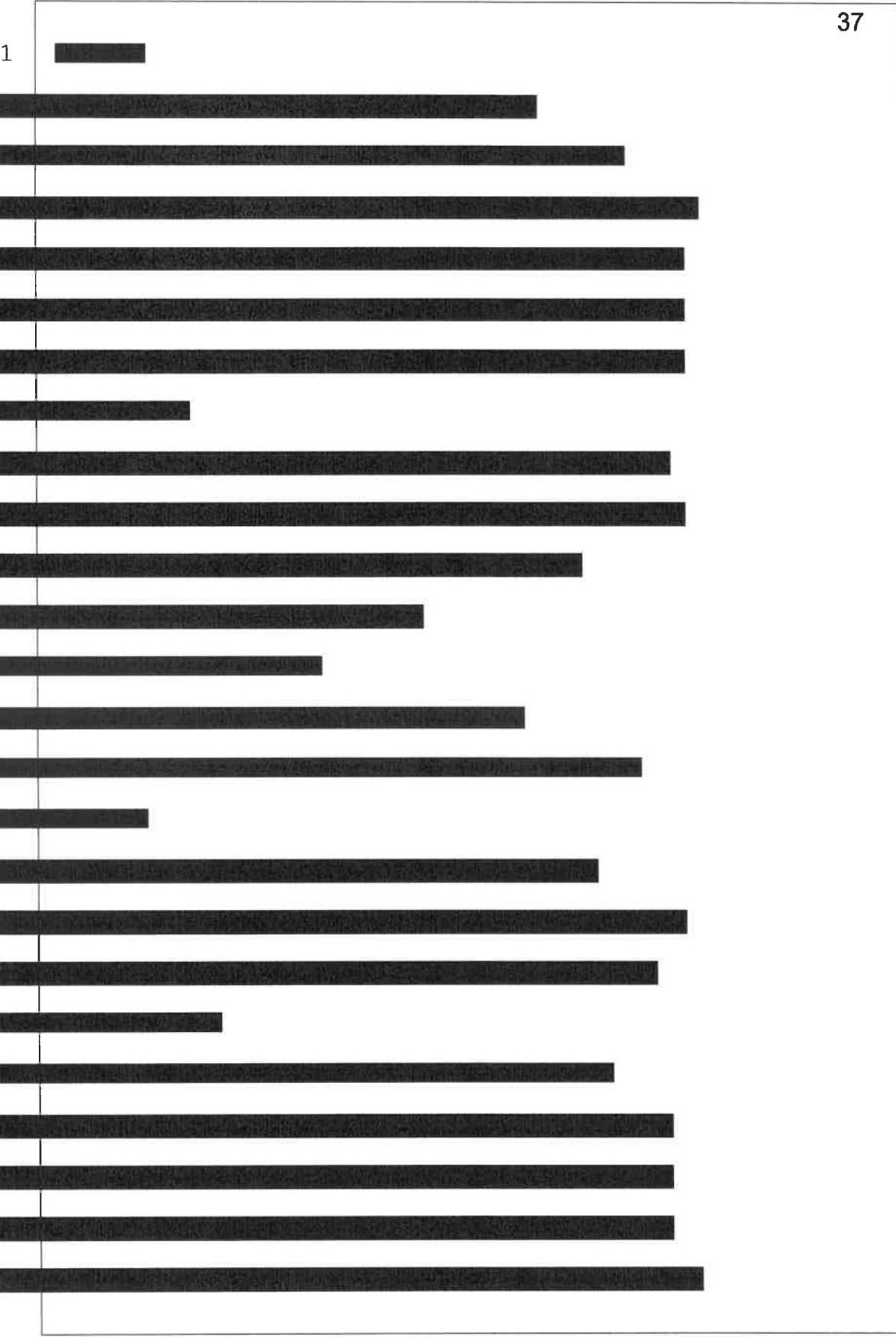
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1 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] calculate.

5 Q. Had you heard of the decision
6 from the United States Court of Appeals for
7 the Third Circuit dismissing the bankruptcy
8 case?

9 A. Have I heard of it?

10 Q. Yes.

11 A. Yes, I've heard of it.

12 Q. When did you hear of that
13 decision for the first time?

14 A. I guess when it occurred.

15 Q. Did you read the decision?

16 A. I've read -- I have read the
17 decision. I -- when it came out.

18 Q. Did you view that decision as a
19 good thing or a bad thing for your clients?

20 MR. BLACK: Objection. Vague.

21 THE WITNESS: For our clients,
22 good. For -- for -- for -- yes.

23 BY MR. HADDAD:

24 [REDACTED]

[REDACTED]

1

39

A horizontal bar chart illustrating the percentage of respondents who have heard of various terms. The y-axis lists 15 terms, and the x-axis represents the percentage of respondents, ranging from 0% to 100% in increments of 10%. The bars are black.

Term	Percentage (%)
1	100
2	100
3	~95
4	100
5	~95
6	~95
7	~95
8	~95
9	~95
10	~95
11	~95
12	~95
13	~95
14	~95
15	~95

17 Q. Did you read the term sheet
18 that was provided to you?

19 A. I did.

20 Q. Did you understand it?

21 A. Yes.

22 Q. Did your clients qualify for

23 payment under the qualification provisions of
24 the term sheet?

25 MR. BLACK: I'm going to object

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1 as privileged.

2 MR. HADDAD: By that, are you
3 instructing him not to answer the
4 question?

5 MR. BLACK: Yes.

6 BY MR. HADDAD:

7 Q. Sir, did you discuss the term
8 sheet with any of your clients?

9 MR. BLACK: Don't answer that.
10 Objection. Privileged.

11 MR. HADDAD: That's a yes or no
12 question.

13 MR. BLACK: I understand.
14 That's privileged. Did you talk to your
15 client about something is privileged.

16 BY MR. HADDAD:

17 Q. Did you send the term sheet to
18 your clients?

19 MR. BLACK: Don't answer that.
20 Privileged.

21 MR. HADDAD: Sir, if you're
22 asserting a privilege, on a privilege log
23 you'd have to describe the communication, the
24 date, the recipient, the sender, et cetera,
25 and --

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1 MR. BLACK: That's not true.

2 MR. HADDAD: -- I'm only --

3 MR. BLACK: Attorney-client
4 communications --

5 MR. HADDAD: Yes, sir.

6 MR. BLACK: -- don't go in a
7 log.

8 MR. HADDAD: Actually, that's
9 literally what does go in a log, is
10 attorney-client communications to the extent
11 someone is asserting privilege.

12 MR. BLACK: Right. Well, my
13 objection stands. Every time you pick up the
14 phone and talk to a client it doesn't need to
15 go into a privilege log.

16 MR. HADDAD: Yeah, well,
17 someone else will need to -- people will need
18 to mute their --

19 Yes, sir. I'm rather confident
20 that the law doesn't talk about telephone
21 calls so much as it does written
22 communications when it comes to privilege
23 logs, and that's what I'm asking for.

24 MR. BLACK: I understand. And
25 we may be able to have that fight in front of

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1 the Court at some point, but for now my
2 objection stands.

3 BY MR. HADDAD:

4 Q. Between mid-March 2023 and
5 April 4, 2023, how many of your 6,000 clients
6 did you speak with?

7 MR. BLACK: Same objection.

8 BY MR. HADDAD:

9 Q. Between mid-March, 2023 and
10 April 4, 2023, did you speak with any of your
11 talc clients, yes or no?

12 MR. BLACK: Same objection.

13 BY MR. HADDAD:

14 Q. Have you issued any statements
15 to the press with respect to the proposed
16 settlement?

17 A. I didn't hear the question.
18 I'm sorry.

19 Q. Sure. Did you issue any
20 statements to the press with respect to the
21 proposed settlement?

22 A. I believe there was one
23 statement.

24 Q. And what statement was that,
25 sir?

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1 A. I don't recall the exact quote
2 in the statement. I'm sure if you've seen
3 it, then you have it.

4 Q. Were those statements and that
5 quote your statements or were they written by
6 somebody else?

7 A. They were mine.

8 Q. Okay. Did you provide the
9 statement that you issued to the press to
10 your clients?

11 MR. BLACK: Don't answer that.

12 It's privileged.

13 BY MR. HADDAD:

14 Q. Do you know whether any of your
15 clients read the statement that you made to
16 the press?

17 MR. BLACK: Don't answer that.

18 It's privileged.

19 BY MR. HADDAD:

20 Q. Do you know?

21 MR. BLACK: Don't answer that.

22 It's privileged.

23 BY MR. HADDAD:

24 Q. Did you say that women are
25 going to get fair compensation to the press?

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1 A. I don't recall the statement I
2 gave to the press. If you have it and want
3 to read it to me, I can comment on it.

4 Q. Sir, did you issue a statement
5 that said, quote, after a decade of
6 litigation, women with ovarian cancer are
7 going to get fair compensation, unquote?

8 A. If that's what my quote was,
9 then I guess I said that.

10 Q. Had you been litigating with
11 Johnson & Johnson for a decade as of that
12 time?

13 A. I think it -- I've been
14 involved in litigation since 2016 with
15 Mr. Birchfield.

16 Q. Right. My question said it
17 related to whether you'd been involved in
18 litigation for a decade.

19 A. I guess that makes it seven
20 years personally.

21 Q. And what did you do to conclude
22 that the women with ovarian cancer are going
23 to get fair compensation?

24 MR. BLACK: Objection. That's
25 privileged.

1 BY MR. HADDAD:

2 Q. Did you believe that statement
3 to be true when you made it?

4 A. Yes.

5 Q. What was the basis for your
6 belief that it was true?

7 MR. BLACK: Objection. That's
8 privileged. It's the same question asked a
9 different way.

10 BY MR. HADDAD:

11 Q. Do you know how much money any
12 of your clients will get from the proposed
13 settlement?

14 MR. BLACK: Objection. That's
15 privileged.

16 Did someone just dial in the
17 Zoom call? Everybody okay?

18 MR. HADDAD: I think your
19 privilege objections are getting to some
20 folks.

21 MR. BLACK: Well, I can
22 understand.

23 BY MR. HADDAD:

24 [REDACTED]

[REDACTED]

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47

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4 Q. Did you read the Plan Support
5 Agreement?

6 A. Yes.

7 Q. Did you understand the Plan
8 Support Agreement?

9 A. Yes.

10 Q. Yes or no. Did you retain
11 counsel to advise you in connection with the
12 Plan Support Agreement?

13 A. Nope.

14 Q. Yes or no. Did you ask any
15 attorney to provide you legal advice in
16 connection with the Plan Support Agreement?

17 A. No.

18 Q. When did you sign the Plan
19 Support Agreement?

20 A. I believe April 3.

21 Q. That was during the pendency of
22 the first LTL bankruptcy, correct?

23 A. I can't recall exact dates, but
24 I believe I -- I believe when I looked, I had
25 signed it on April 3.

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1 Q. And LTL filed bankruptcy on
2 April 4, 2023. So if you signed on April 3,
3 it would have been the day before the
4 bankruptcy, the new bankruptcy filing.

5 A. Correct.

6 Q. At the time that you signed the
7 Plan Support Agreement, did you know that LTL
8 was going to file bankruptcy immediately
9 after the dismissal of its initial
10 bankruptcy?

11 A. Not immediately, but I knew
12 they were going to file it at some point
13 after.

14 Q. And were you aware during the
15 first bankruptcy that LTL had a commitment
16 from Johnson & Johnson for \$60 billion of
17 support to pay talc claimants?

18 A. No.

19 Q. Did you ever learn that during
20 the first bankruptcy LTL had a commitment
21 from Johnson & Johnson to pay up to
22 \$60 billion to support talc claimants?

23 A. Up to 60 billion.

24 Q. Yes, sir.

25 A. Yeah, I knew that number. My

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1 understanding was that Johnson & Johnson was
2 never paying \$60 billion for talc claims.

3 Q. What was that understanding
4 based upon?

5 MR. BLACK: Vague. If you can
6 reveal it without --

7 THE WITNESS: I didn't believe
8 Johnson & Johnson would ever pay \$60 billion
9 for talc claims.

10 BY MR. HADDAD:

11 Q. Sure. And what was the basis
12 for that belief, sir?

13 MR. BLACK: If you can answer
14 that without revealing privilege, go ahead.

15 THE WITNESS: That's my --
16 understanding is based upon discussions with
17 others over the last several years and
18 nothing -- no discussion in particular, but
19 certainly I had never heard ever from anyone
20 at Johnson & Johnson that they would agree to
21 pay \$60 billion for talc claims.

22 BY MR. HADDAD:

23 Q. Were you aware --

24 A. Nor do I think that anyone in
25 leadership had ever been told by Johnson &

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1 Johnson that they would pay \$60 billion for
2 talc claims.

3 Q. When you say "leadership," to
4 whom are you referring?

5 A. Anyone in leadership.

6 Q. Leadership of who? From who?

7 A. Of the MDL.

8 Q. Sir, were you aware that as
9 part of its first bankruptcy filing LTL had
10 secured the commitment of J&J to support up
11 to \$60 billion in talc liability?

12 A. I guess it's the "up to" part
13 that -- I understand that, that there was
14 language with respect to an up to \$60 billion
15 at some point.

16 Q. And you read that in the Third
17 Circuit's opinion, right?

18 A. It was in the opinion, I
19 believe.

20 Q. And, sir, do you know how much
21 Johnson & Johnson has committed to support
22 the new bankruptcy filing with?

23 A. 8.9 billion present value, up
24 to \$12 billion in future payments total.

25 Q. And do you think that the

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1 commitment of 8.9 billion is better than the
2 prior commitment of 60 billion for your
3 clients?

4 A. I believe that's a real
5 commitment.

6 Q. So the 60 billion was a fake
7 commitment in your view.

8 A. I don't know. I wasn't
9 involved in any of those discussions or
10 communications, so I'm not going to comment
11 on what it is or what it isn't.

12 Q. Well, sir, if Johnson & Johnson
13 makes a representation, is that something
14 that you were prepared to rely upon?

15 MR. BLACK: Objection. Vague.

16 THE WITNESS: If they make a
17 representation to me it is.

18 BY MR. HADDAD:

19 Q. Well, if they made a
20 representation to the Court that they would
21 back the talc liability up to \$60 billion, is
22 that something you can rely on?

23 A. I'm not going to comment on a
24 statement that's made while I wasn't present
25 or -- but I can tell you what they committed

1 to me as part of this plan.

2 Q. Do you believe that any of your
3 clients have the chance to recover more than
4 they would receive under the Plan Support
5 Agreement if they were to go to trial against
6 Johnson & Johnson?

7 MR. BLACK: Objection. Don't
8 answer that. It's privileged.

9 MR. BLOCK: Mr. Haddad, can we
10 make sure that others have time to question
11 as well, please? Thank you.

12 BY MR. HADDAD:

13

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1

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A horizontal bar chart illustrating the percentage of respondents who have heard of different topics. The y-axis lists ten topics, each represented by a black horizontal bar. The length of each bar corresponds to the percentage of respondents who have heard of that topic. The topics and their approximate percentages are:

Topic	Percentage (approx.)
Healthcare	95
Technology	92
Finance	88
Politics	85
Entertainment	82
Science	78
Sports	75
Food & Beverage	72
Automotive	68
Real Estate	65

17 Q. Sir, are your clients required
18 to vote for the plan?

19 A. No one is required to do
20 anything.

21 Q. Did you agree, sir, to do all
22 things reasonably necessary and appropriate
23 to get your clients to vote in favor of the
24 plan?

25 A. My responsibility is to provide

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1 the information to my clients and -- and to
2 propose that they support the plan.

3 Q. Are your clients bound to the
4 Plan Support Agreement?

5 MR. BLACK: Objection. Asked
6 and answered.

7 BY MR. HADDAD:

8 Q. You can answer, sir.

9 A. My clients are not bound to
10 anything.

11 Q. Sir, did you represent and
12 warrant that your clients would be bound to
13 the Plan Support Agreement?

14 A. My responsibility and my
15 discussions are that I would propose to our
16 clients that they support the plan.

17 Q. I wasn't asking about your
18 discussions, sir. I'm asking specifically
19 about the agreement that you signed. Did
20 that bind each of your talc claimants?

21 MR. BLACK: Objection. Asked
22 and answered. And privileged. That's
23 privileged.

24 MR. HADDAD: I'm sorry. The
25 agreement is privileged? Is that your --

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1 MR. BLACK: Yes. That's
2 privileged, yes. Whether it binds his
3 clients is privileged.

4 MR. HADDAD: If it says on its
5 face that it's binding to each talc claimant,
6 are you taking the position that's
7 privileged, counsel?

8 MR. BLACK: You're asking him
9 if it binds his clients; and if he thinks so,
10 that's privileged.

11 MR. HADDAD: Okay. I had
12 actually asked him if it does, not what he
13 thinks.

14 MR. BLACK: I understand your
15 argument, counsel.

16 BY MR. HADDAD:

17 Q. So you're not going to answer
18 the question?

19 MR. BLACK: If I instruct him
20 not to answer, then he's not.

21 BY MR. HADDAD:

22 Q. Sir, how many of your clients
23 think the Plan Support Agreement is a good
24 idea?

25 MR. BLACK: Objection.

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1 Privileged.

2 BY MR. HADDAD:

3 Q. Do any?

4 MR. BLACK: Objection.

5 Privileged.

6 BY MR. HADDAD:

7 Q. Is the Plan Support Agreement
8 binding or illusory?

9 MR. BLACK: Objection.

10 Privileged.

11 BY MR. HADDAD:

12 Q. Do you consider the Plan
13 Support Agreement to be binding?

14 MR. BLACK: Objection.

15 Privileged.

16 BY MR. HADDAD:

17 Q. When you signed your name to
18 the Plan Support Agreement, sir, what were
19 you intending to convey?

20 A. I was intending --

21 MR. BLACK: I think that's
22 privileged, too. I mean he signed it, so
23 what he intended as a lawyer is privileged
24 so --

25 BY MR. HADDAD:

1

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16 BY MR. HADDAD:

17 Q. Sir, is there -- do you have
18 any agreement with anyone to pay you legal
19 fees in connection with the bankruptcy case?

20 A. No.

21 Q. Sir, did you see the debtor's
22 8-K filed on April 4, 2023?

23 A. Can you repeat the question,
24 please?

25 Q. Have you seen the debtor's Form

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1 8-K filed with the Securities and Exchange
2 Commission on April 4, 2023?

3 A. I briefly looked at that.

4 Q. Did you read the sentence that
5 said, quote, LTL also has secured commitments
6 from over 60,000 current claimants to support
7 a global resolution on these terms, unquote?

8 A. Yes.

9 Q. Do your 6,000 current claimants
10 support the global resolution on these terms?

11 MR. BLACK: Objection.

12 Privileged.

13 BY MR. HADDAD:

14 Q. Does LTL have secured
15 commitments from over 60,000 current
16 claimants to support a global resolution?

17 A. My understanding is they have
18 commitments from attorneys representing those
19 clients, if not more, and I believe there are
20 probably more with attorneys that are going
21 to recommend that their clients support the
22 agreement.

23 Q. You would agree with me that
24 there's a difference between a recommendation
25 to support and a commitment to support by the

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1 claimant itself, correct, sir?

2 A. Semantics, but, yes.

3 Q. Semantics? I misheard -- I'm
4 not sure I heard you.

5 A. There is a difference.

6 MR. HADDAD: All right. Thank
7 you. That's all I've got for now.

8 BY MR. SATTERLEY:

9 Q. Good morning, sir. This is Joe
10 Satterley. Do you need to take a break
11 before we begin? I think I'm going to be the
12 second attorney to go.

13 A. No. I'm good, Mr. Satterley.
14 I appreciate it.

15 Q. Okay. Can you hear me okay?

16 A. I can.

17 Q. Okay. I represent Mr. Valadez
18 and many other mesothelioma victims.

19 Have you had a chance to log in
20 and watch any of the hearings with Judge
21 Kaplan?

22 A. I was on the hearing on
23 Wednesday -- Tuesday, Tuesday.

24 Q. The long hearing, ten o'clock
25 in the morning till about 4:30, were you on

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1 that one?

2 A. Yeah. I was not on the
3 entirety of the hearing, but I was on some of
4 the hearing.

5 Q. Did you see me present
6 information about a young man, Mr. Valadez,
7 24 years of age?

8 A. Did not. I missed your
9 portion.

10 Q. Okay. Do you know if
11 someone -- well, first, before I get to that,
12 these 6,000 people that you represent, do you
13 know how many of them are mesothelioma versus
14 ovarian cancer?

15 A. I believe three.

16 Q. Three mesothelioma cases?

17 A. I believe so.

18 Q. And the other 5,997 would be
19 some type of other cancer that's not
20 mesothelioma, correct?

21 A. I can't tell you the exact
22 number, but something to that effect is
23 reasonable, in that neighborhood.

24 Q. Have you attempted to
25 calculate, using the term sheet, how much

1

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[REDACTED]

1 [REDACTED]

12 Q. Okay. You have a website,

13 correct?

14 A. I do.

15 Q. Is all of the information on

16 the website true and accurate?

17 A. I don't know if any of it is
18 outdated.

19 Q. Okay. And on your website --

20 A. There's a lot of information.

21 THE COURT REPORTER: Pardon me?

22 THE WITNESS: I'm just saying
23 there's a lot of information on the website,
24 and whether or not it's all true and nothing
25 has changed that hasn't been updated I can't

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1 answer.

2 BY MR. SATTERLEY:

3 Q. Have you ever tried a talc
4 case?

5 A. I have not tried a talc case.

6 Q. Have you ever attended a talc
7 trial to watch the evidence presented before
8 a jury?

9 A. I have not attended a talc
10 trial.

11 Q. Have you ever taken a corporate
12 representative in a talc case regarding a
13 corporation's knowledge about talc and
14 talc-related diseases?

15 A. I have not.

16 Q. Have you ever preserved a
17 client's testimony, a dying client's
18 testimony, regarding their disease and their
19 exposures to talc?

20 A. I have not.

21 Q. Have you ever attended a
22 deposition of someone suffering from a
23 talc-induced cancer?

24 A. I'm trying to recall if I
25 attended a deposition for a talc mesothelioma

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1 client a while back and I don't believe I
2 did.

3 Q. Have you -- you mentioned early
4 in the deposition that at the time of the
5 filing you had less than 50 cases in suit, is
6 that accurate, talc cases?

7 A. I believe that's correct.

8 Q. And did you file those
9 yourself, or did you refer those out and have
10 other folks file those?

11 A. I'm sorry. Could you repeat
12 the question.

13 Q. Did you personally file those
14 cases, or did you have another attorney in a
15 co-counsel situation file the cases?

16 A. There are over a thousand cases
17 that I believe I have relationships with
18 co-counsel that have been filed and our
19 office, I believe, that another attorney in
20 my office actually filed those cases.

21 Q. And who is that attorney?

22 A. But I may have -- I may have
23 signed off on the pleadings. If you want to
24 know who actually sent everything in, you
25 know, who the paralegal was or -- you know, I

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1 don't know that you really care to know about
2 any of that.

3 Q. No, I don't care about the
4 paralegal's name. I'm just trying --

5 A. Okay.

6 Q. Who's the attorney -- I'm
7 sorry. Who's the other attorney in your
8 office who would have actually filed those
9 cases meetings?

10 A. It would have been myself or
11 Darsey Glean.

12 Q. Are there other attorneys in
13 your office that are sort of I guess
14 primarily handling talc cases other than you
15 and this other person?

16 A. Primarily, no.

17 Q. Of the 50 cases you referred to
18 with Mr. Haddad earlier that were filed, are
19 those cases that you or your office actually
20 did the filing themselves?

21 A. I believe so.

22 Q. And what jurisdictions did you
23 file those in?

24 A. In the MDL.

25 Q. So that would be in New Jersey,

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1 correct?

2 A. Correct.

3 Q. And you're licensed to practice
4 law in Texas, correct?

5 A. Correct.

6 Q. Are you licensed in any other
7 states?

8 A. No.

9 Q. Prior to signing the PSA, did
10 you review any of the ethical rules in Texas?

11 MR. BLACK: Objection. Vague.

12 MR. SATTERLEY: I'm sorry?

13 MR. BLACK: Objection. Vague.

14 THE WITNESS: I don't
15 understand your question.

16 BY MR. SATTERLEY:

17 Q. Sure. You know there's rules
18 of ethics that have been adopted by the State
19 of Texas, correct?

20 A. Yes.

21 Q. And prior to signing the PSA,
22 did you go to those rules and look at them
23 and try to see if there's any ethical issues
24 that might be presented in the -- signing the
25 PSA?

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1 MR. BLACK: Don't answer that.

2 It's privileged. It's harassing. I don't
3 think it's relevant to the injunction, the
4 issues at hand. Way out of bounds.

5 BY MR. SATTERLEY:

6 Q. Did you -- yes or no. Did you
7 consult with any ethics attorneys with
8 regards to the PSA?

9 MR. BLACK: Same objection.

10 BY MR. SATTERLEY:

11 Q. Have you ever given a
12 deposition before?

13 A. Yes.

14 Q. On how many occasion?

15 A. I believe one.

16 Q. And when was that?

17 A. Sometime probably around ten
18 years ago.

19 Q. And just generally what was the
20 issue in the deposition you gave?

21 A. It was related to a lawsuit
22 against Google.

23 Q. And was it a lawsuit you filed?

24 A. It was a class case.

25 Q. Okay. And I'm not going to go

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1 deep into this. I just want to sort of
2 understand how it came that you gave a
3 deposition in a class case.

A. I was a class rep.

5 Q. Okay. And did you have counsel
6 representing you there?

7 A. I did.

8 Q. And who was that?

9 A. Bob Foote.

Q. I didn't catch that.

11 A. Bob Foote.

12 Q. F-O-O-T?

13 A. F-O-O-T-E

14 Q. Okay. And do you know who was
15 the attorney that took your deposition?

16 A. I do not.

17 | Page

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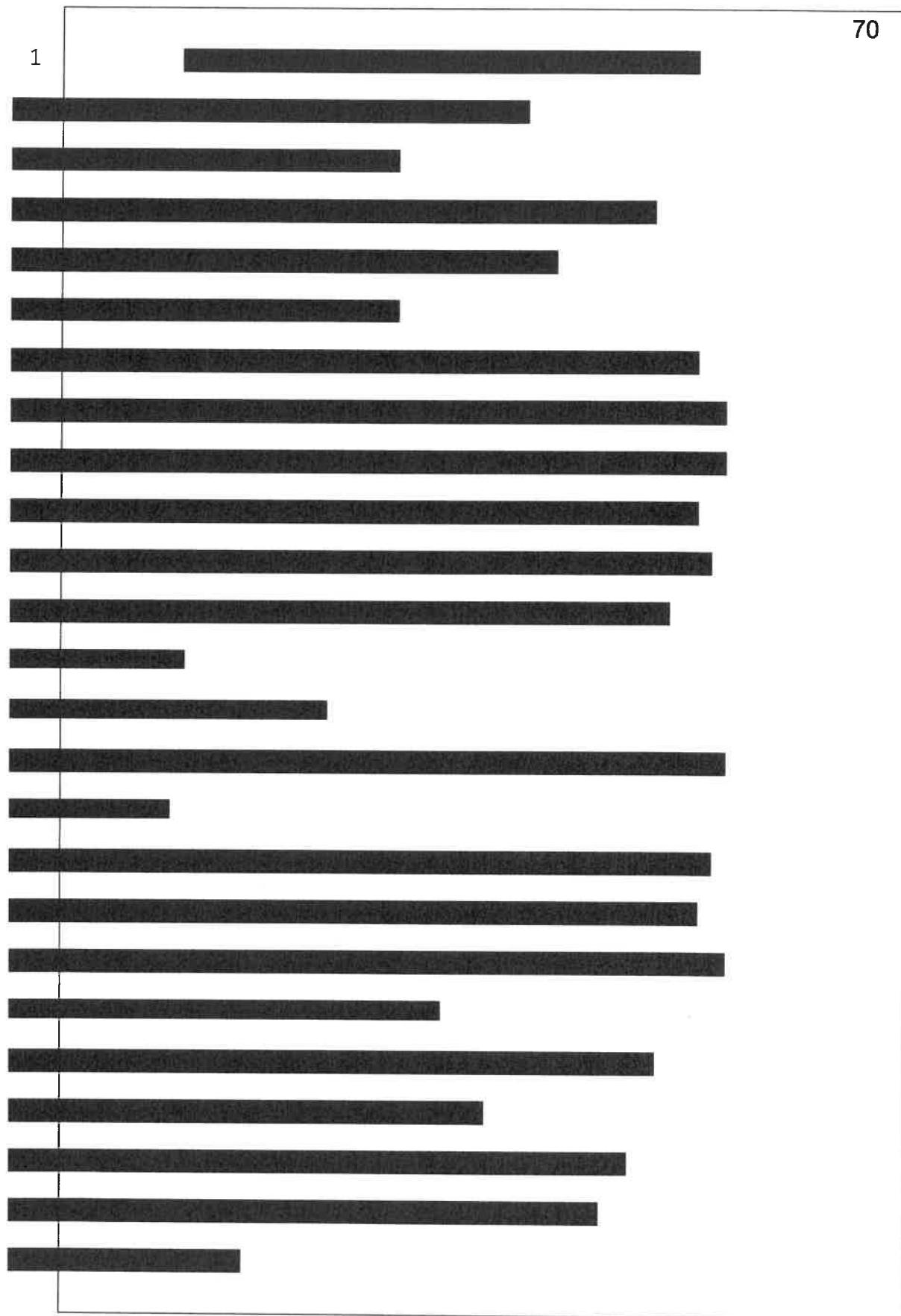
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1 Q. Have you made a calculation of
2 what your clients, any of your clients, would
3 potentially get under the term sheet?

4 MR. BLACK: I think that's
5 privileged, actually, whether he's done a --

6 MR. SATTERLEY: I'm not asking
7 for the -- what the calculation is. I'm
8 just -- have you made the calculation.

9 MR. BLACK: I understand. I
10 still think it's privileged. I get what
11 you're asking, sir.

12 MR. SATTERLEY: Are you
13 directing him not to answer the question?

14 MR. BLACK: Yes, sir.

15 BY MR. SATTERLEY:

16 Q. Do you know the date of
17 diagnosis of each of your 6,000 clients?

18 MR. BLACK: Same objection.

19 BY MR. SATTERLEY:

20 Q. Do you know what a channeling
21 injunction is?

22 A. I -- I understand the premise
23 of the channeling injunction. I'm going to
24 tell you I am certainly not an expert in
25 bankruptcy litigation, but I understand.

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1 Q. What's your understanding of
2 what a channeling injunction is?

3 A. My understanding, it is a tool
4 that is being used in this particular case
5 that would allow for a settlement to occur
6 within the bankruptcy realm that would
7 provide finality, basically, as a basis for
8 this settlement in a way that we wouldn't be
9 able to have that outside of using the
10 channeling injunction.

11 Q. Do you understand that the
12 intent of this bankruptcy would be to prevent
13 individuals from filing lawsuits and going
14 before a jury in the future?

15 A. That it would permit that?

16 Q. No. Prevent, prevent.

17 A. Yes.

18 Q. And you understand that your
19 future clients, that if you were to be
20 retained in the future by somebody else,
21 would forever be barred from going before a
22 jury and asking for damages?

23 A. I understand for -- I don't --
24 currently I don't represent future clients,
25 so they're future clients --

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1 Q. Sure, but if --

2 A. -- is my understanding.

3 Q. But if somebody were to call
4 you on June the 1st, after this proposed plan
5 is out there supposedly, and say,
6 Mr. Pulaski, I want you to represent me, I've
7 got mesothelioma or I've got ovarian cancer,
8 you understand this plan, if confirmed, would
9 bar them from filing a lawsuit and going
10 before a jury. You understand that, correct?

11 A. Confirmed, correct.

12 Q. Okay. And you understand that,
13 of your 6,000 clients, if 50 of them really
14 wanted to go to trial, they really wanted to
15 have a jury make a decision about their case
16 but yet the plan was confirmed, those 50
17 people would forever be barred from going
18 before a jury. You understand that, correct?

19 A. Correct.

20 Q. Okay. By the way, I know that
21 there's been some discussions regarding time,
22 time limits today, and we had previously
23 talked about going four hours for each of
24 these depositions we're doing this weekend.

25 Are you comfortable, are you

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1 okay, to go four hours today?

2 A. I am not.

3 MR. BLACK: I think that's a
4 discussion that we can have offline, but my
5 understanding was it was a two-hour
6 deposition, and that's what we budgeted.

7 MR. SATTERLEY: Okay. So I --

8 MR. BLACK: So I would say no
9 is the answer.

10 MR. SATTERLEY: Okay. Well,
11 let me ask the witness.

12 BY MR. SATTERLEY:

13 Q. What are your time limits
14 today?

15 MR. BLACK: He's got two hours.
16 I can answer that.

17 MR. BLOCK: Let's keep going
18 and see if we have a dispute.

19 MR. BLACK: So it's 42 minutes,
20 roughly.

21 MR. SATTERLEY: So I'm going to
22 intentionally cut my questions short so
23 Mr. Block and other folks have questions.
24 I'm going to about I think five or ten more
25 minutes.

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1 BY MR. SATTERLEY:

2 Q. With regards to Mr. Watts, have
3 you and Mr. Watts worked together in other
4 litigations?

5 A. Yes.

6 Q. On how many different
7 litigations?

8 A. Several.

9 Q. When you say "several," is it
10 five or ten or more?

11 A. I would say five or ten.

12 Q. Can you just generally give me
13 some of the examples of the other litigations
14 you and Mr. Watts worked together on?

15 A. We have worked together in the
16 Pradaxa litigation. We have worked together
17 in Zantac litigation. We have worked
18 together -- off the top of my head, I can't
19 recall. But there have been other mass tort
20 litigations that we have worked on.

21 MR. SATTERLEY: Did you work
22 with him --

23 THE COURT REPORTER: What was
24 the first one you mentioned? Did you say
25 Paxil?

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1 THE WITNESS: Pradaxa,
2 P-R-A-D-A-X-A. I don't believe I worked with
3 Michael at all on the Paxil litigation.

4 BY MR. SATTERLEY:

5 Q. Did you work with Mr. Watts on
6 the BP litigation?

7 MR. BLACK: Don't answer that.

8 THE WITNESS: I did not.

9 MR. BLACK: This is going
10 outside the scope of the deposition, and so
11 it's privileged what other litigations he's
12 worked on.

13 MR. SATTERLEY: I disagree. So
14 he answered the question he did not, so we
15 can move on.

16 BY MR. SATTERLEY:

17 Q. With regards to -- did you
18 attend the Vegas conference this week?

19 A. I did.

20 Q. And did you attend the session
21 where Mr. Watts spoke on talc issues?

22 A. I did.

23 Q. And did you see the PowerPoint
24 presentation he made?

25 A. I did see the PowerPoint

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1 presentation he made.

2 Q. And did you -- is that the
3 first time you had seen that presentation?

4 A. That is.

5 Q. Do you know who put that
6 presentation together for him?

7 A. I do not.

8 Q. Did you verify the accuracy of
9 any of the information he presented at this
10 Vegas conference?

11 A. Not his or Mr. Birchfield's or
12 the rest of the panel up there.

13 Q. Have you read any opinions,
14 published opinions, regarding talc verdicts
15 being affirmed?

16 MR. BLACK: I think that's
17 privileged whether he's reading -- that would
18 be in connection with his work for his
19 clients, so I'm going to instruct him not
20 answer.

21 MR. SATTERLEY: I disagree. I
22 respectfully disagree.

23 MR. BLACK: I understand.

24 BY MR. SATTERLEY:

25 Q. Have you reviewed exhibits

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1 admitted in a court in trials involving talc
2 and mesothelioma?

3 A. Have I reviewed the exhibits?

4 Q. Sure.

5 A. You mean have I seen exhibits?

6 Q. Yeah, reviewed exhibits

7 admitted in court in talc mesothelioma cases.

8 MR. BLACK: So I'm going to
9 object as vague but also privileged. I mean,
10 all of that would be in connection with his
11 work on his talc docket as a lawyer. I don't
12 see how that's not privileged.

13 MR. SATTERLEY: I disagree.

14 MR. BLACK: I understand.

15 BY MR. SATTERLEY:

16 Q. Are you refusing to answer that
17 question?

18 MR. BLACK: He is if I instruct
19 him to.

20 BY MR. SATTERLEY:

21 Q. Have you read any trial
22 transcripts from any talc trials?

23 MR. BLACK: Same objection.

24 BY MR. SATTERLEY:

25 Q. An individual with ovarian

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1 cancer who is 47 years of age and has no
2 alternative exposures to any other asbestos
3 other than Johnson's Baby Powder, how much
4 would that individual get under the term
5 sheet?

6 A. I can't specifically answer
7 that question without looking at it and
8 reviewing it. And, again, my understanding
9 is the term sheet is kind of a broad
10 construct that is supposedly -- that may move
11 and may change, but I don't know the answer
12 to that question.

13 Q. Have you been admitted pro hac
14 vice in the jurisdictions where you have
15 co-counseled with others and filed these
16 cases?

17 A. I have not. I mean, maybe I
18 have for another case but I have not for
19 this.

20 Q. I'm specifically talking about
21 talc cases. Have you been --

22 A. I have not.

23 Q. Okay. So the only jurisdiction
24 that you are licensed or given permission to
25 practice law is Texas, correct?

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1 MR. BLACK: Objection. Form.

2 Vague.

3 | BY MR. SATTERLEY:

4 Q. In talc cases.

5 MR. BLACK: You can answer.

6 You can answer.

7 THE WITNESS: I'm -- correct.

8 BY MR. SATTERLEY:

9

A series of 15 horizontal black bars of varying lengths, decreasing from top to bottom. The bars are evenly spaced vertically and have a consistent thickness.

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11 Q. Do you believe --

12 (Court reporter clarification.)

13 THE WITNESS: Anything having
14 to do with this.

15 BY MR. SATTERLEY:

16 Q. Okay. Do you believe J&J could
17 pay, fully pay, all the talc victims
18 suffering from cancer?

19 MR. BLACK: Objection. Vague.

20 MR. TORBORG: Objection.

21 Foundation.

22 THE WITNESS: I believe they
23 can pay the 8.9 billion in present value
24 money and to pay 12 billion over time.

25 BY MR. SATTERLEY:

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1 Q. But my question was a little
2 bit different than that.

3 My question is, do you believe
4 J&J can fully pay all talc victims suffering
5 from cancer?

6 MR. BLACK: Objection. Vague.

7 MR. TORBORG: Objection.

8 Foundation.

9 BY MR. SATTERLEY:

10 Q. Go ahead, sir.

11 A. I believe that they can make a
12 fair and reasonable settlement.

13 Q. Have you made an evaluation
14 regarding what you believe J&J can pay with
15 regards to talc victims?

16 MR. BLACK: Objection. Don't
17 answer that. It's privileged.

18 BY MR. SATTERLEY:

19 Q. Do you know what tremolite is?

20 A. Excuse me?

21 Q. Do you know what tremolite is?

22 A. What is that?

23 Q. Is that no, you don't know what
24 tremolite is?

25 A. No.

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1 MR. BLACK: I think it's a no.

2 BY MR. SATTERLEY:

3 Q. Do you know what anthophyllite
4 is?

5 A. No.

6 Q. Do you know what chrysotile is?

7 A. These are words that I've
8 heard, but I'm not going to -- I can't give
9 you a definition without it being inaccurate
10 so I'm not going to.

11 Q. Do you know who Dr. Gavin
12 Hildick-Smith is?

13 A. No.

14 Q. Can you give me the names of
15 any executives at Johnson & Johnson from the
16 1970s that knew about the hazards of
17 asbestos?

18 A. Can I give you an answer right
19 now --

20 MR. BLACK: This is all
21 privileged. Look, if he knows this stuff,
22 it's in connection with his work on the talc
23 docket. So, I mean, I've allowed you all the
24 medical stuff, but I'm going to cut it off.

25 BY MR. SATTERLEY:

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1 Q. Are you refusing to answer that
2 question?

3 MR. BLACK: He is.

4 MR. SATTERLEY: Let me look at
5 my notes real quick.

6 BY MR. SATTERLEY:

7 Q. Oh, do you -- do you believe
8 that Baby Powder causes ovarian cancer?

9 A. I believe it causes an
10 increased risk of ovarian cancer, and, yes, I
11 do.

12 Q. And on your website you promote
13 and state that talcum powder causes many
14 different types of cancers, correct?

15 A. That is correct.

16 Q. And so if I were to print out
17 your website, that's pulaskilawfirm.com,
18 right?

19 A. That is correct.

20 Q. And so the information on your
21 website about talc and causing various
22 cancers, that's true, right?

23 MR. BLACK: Objection. Asked
24 and answered.

25 THE WITNESS: If there is

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1 something that is on there that has not been
2 updated I don't know, but I don't have the
3 website in front of me, nor have I looked at
4 it recently, but typically the information we
5 put on our website at the time we put it on
6 is true and correct to the best of our
7 knowledge.

8 BY MR. SATTERLEY:

9 Q. And all the verdicts that
10 you're promoting on your website, you weren't
11 involved in any of those verdicts, correct?

12 MR. BLACK: Objection. Don't
13 answer that. It's just harassing, honestly.
14 You don't need to answer.

15 MR. SATTERLEY: He can verify
16 one way or the other.

17 MR. BLACK: I just -- this
18 is --

19 BY MR. SATTERLEY:

20 Q. Were you involved in any of the
21 verdicts that you put on your website?

22 MR. BLACK: No more. This is
23 just way beyond the scope. I'm sorry.

24 BY MR. SATTERLEY:

25 Q. Did I get an answer, sir?

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1 MR. BLACK: Don't answer it.

2 THE COURT REPORTER: I didn't
3 even get the question. I'm sorry.

4 BY MR. SATTERLEY:

5 Q. The question was, were you
6 involved in any of the verdicts that you put
7 on your website, the talc verdicts, sir?

8 MR. BLACK: Don't answer it.

9 MR. SATTERLEY: Given that I
10 was just told that this is limited to two
11 hours, I'm going to stop asking questions
12 right now and reserve my right once we talk
13 to the Court about this.

14 Mr. Block or who whoever else
15 wants to go next, go ahead.

16 BY MR. BLOCK:

17 Q. Mr. Pulaski, can you hear me
18 okay?

19 A. I can, Mr. Block.

20 Q. Okay. This is Jerry Block from
21 Levy Konigsberg, and I don't think we've met
22 before. Have we met? I don't think so,
23 right?

24 A. I don't believe so.

25 Q. Okay. Well, nice to meet you.

1 | Sorry it's under these circumstances.

2 As a fellow plaintiff's lawyer,
3 are you a member of the AAJ?

4 A. I am.

5 Q. Okay. So am I, but I do have
6 to ask you some questions.

7

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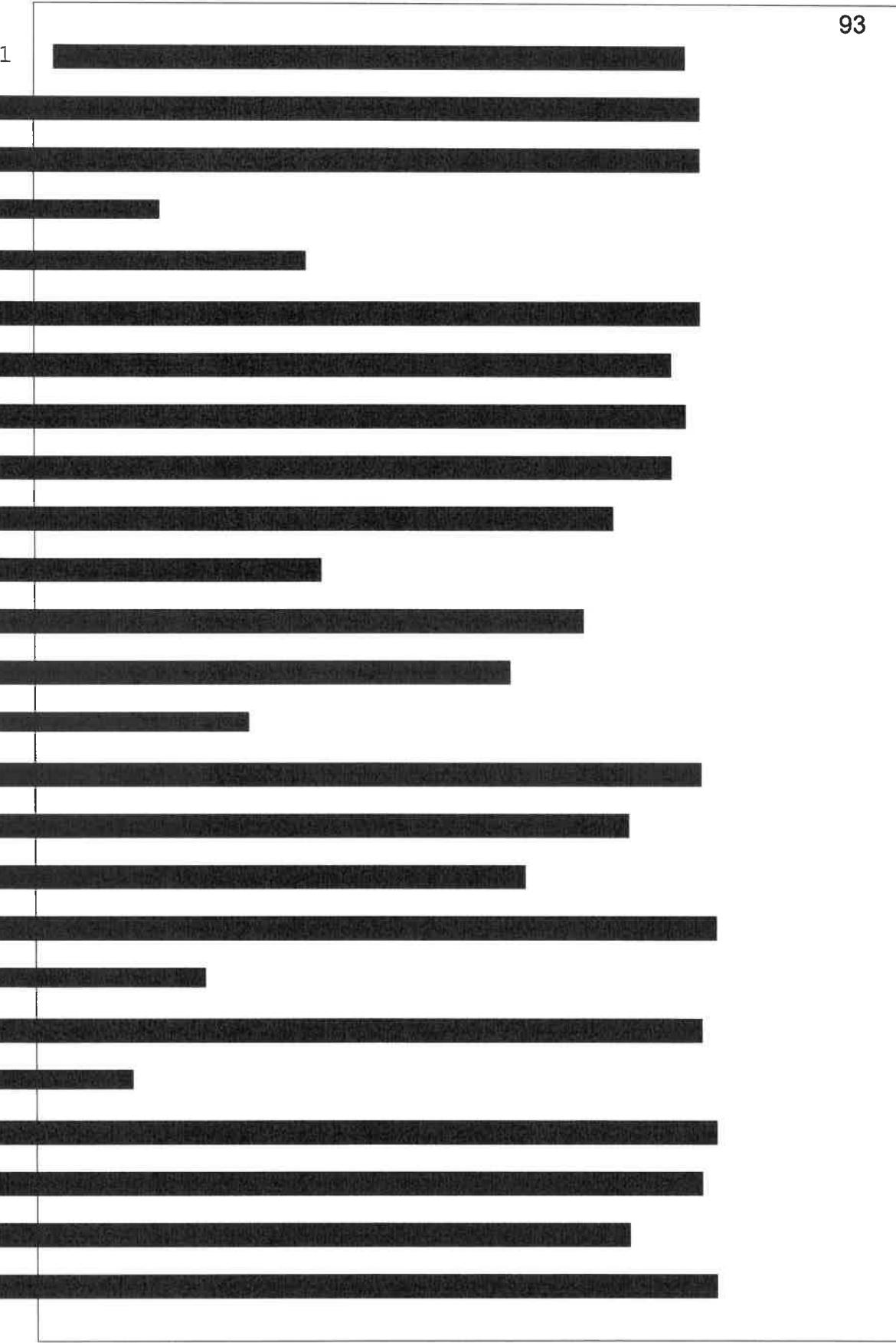
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10 BY MR. BLOCK:

11

23 BY MR. BLOCK:

24 Q. Okay. Mr. Pulaski, does

25 your -- does your firm have a -- Mr. Pulaski,

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1 of the 6,000 cases listed on your signed PSA,
2 for how many of them has your law firm
3 ordered medical records?

4 MR. BLACK: Objection. Asked
5 and answered and privileged.

6 BY MR. BLOCK:

7 Q. Has your law firm ordered
8 medical records for even one of the
9 approximate 6,000 cases listed on your signed
10 PSA?

11 MR. BLACK: Objection. Asked
12 and answered, privileged, and now harassing.

13 MR. BLOCK: Just if you're
14 going to instruct not to answer, please state
15 it for the record so we have a clean record
16 of it.

17 MR. BLACK: I am. I said
18 previously if I object I'm -- it's equivalent
19 to an instruction not to answer. I'm trying
20 to keep my objections short for you.

21 MR. BLOCK: Okay. All right.

22 BY MR. BLOCK:

23 Q. Do you have a pathology report
24 confirming diagnosis for any of the ovarian
25 cancer cases listed on your signed PSA?

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1 MR. BLACK: Same three previous
2 objections.

3 BY MR. BLOCK:

4 Q. Okay. And you understand these
5 are instructions not to answer, and you're
6 complying with that instruction, right,
7 Mr. Pulaski?

8 A. That is correct.

9 Q. Okay. And for the less than
10 five mesothelioma cases that you put on the
11 list, do you have a pathology report
12 confirming diagnosis for any of those?

13 MR. BLACK: Same objection.

14 BY MR. BLOCK:

15 Q. Okay. Do you have any death
16 certificates for the death cases on the list?

17 MR. BLACK: Same objection.

18 BY MR. BLOCK:

19 Q. Mr. Pulaski, do you have any
20 sworn statement testifying to the use or
21 exposure to Johnson's Baby Powder for any of
22 your 6,000 cases attached to your signed PSA?

23 MR. BLACK: Same objection.

24 You guys have 15 minutes, so in the spirit of
25 trying to be transparent, any questions about

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1 what's in the files I'll object to.

2 MR. BLOCK: No, no, no. We
3 have two hours.

4 MR. BLACK: No, you don't. In
5 15 minutes I'm cutting it off absent another
6 court order. I'm sorry.

7 BY MR. BLOCK:

8 Q. Mr. Pulaski, of the approximate
9 6,000 cases that are listed on your signed
10 Plan Support Agreement, how many of them are
11 subject to statutes of limitations that have
12 not expired?

13 MR. BLACK: Don't answer that.

14 Privileged.

15 MR. TISI: Jerry, I'd like to
16 ask some questions, so if you'd leave me five
17 minutes, I'd appreciate it.

18 MR. BLOCK: Sure.

19 BY MR. BLOCK:

20 Q. Mr. Pulaski, do you have a
21 definition of what you would call a talc
22 claimant for a case against J&J or LTL?

23 MR. BLACK: Objection. That's
24 privileged.

25 BY MR. BLOCK:

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1 Q. Mr. Pulaski, do you represent
2 talc claimants against J&J and LTL?

3 A. Yes.

4 Q. And what do you mean by "talc
5 claimant"?

6 MR. BLACK: Objection. That's
7 privileged. Same question asked a different
8 way.

9 BY MR. BLOCK:

10 [REDACTED]

25 BY MR. BLOCK:

1

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7 MR. BLOCK: I will pass the
8 questioning over to Mr. Tisi. Thank you.

9 THE WITNESS: Thank you,
10 Mr. Block.

11 BY MR. TISI:

12 Q. Mr. Pulaski, my name is Chris
13 Tisi. I'm with the firm of Levin Papantonio
14 Rafferty --

15 MR. SATTERLEY: And, Chris,
16 this is Joe. I'm sorry to interrupt. I have
17 one question, so if you'd just leave me 30
18 seconds, I'd appreciate it.

19 MR. TISI: Sure. No problem.

20 BY MR. TISI:

21 Q. I represent ovarian cancer and
22 mesothelioma clients.

23 Very quickly, you've been
24 looking down at your desk, and do you have
25 any notes with you, sir?

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1 A. I have none.

2 Q. You have none? Okay.

3 Do you -- do you know who Alice
4 Blount is?

5 A. I'm sorry?

6 Q. Do you know who Alice Blount
7 is?

8 A. No.

9 Q. Do you know who Johns Hopkins
10 is?

11 A. Johns Hopkins?

12 Q. John Hopkins, a person.

13 A. No.

14 Q. Do you know who Daniel Cramer
15 is?

16 A. No.

17 Q. Do you know who Katie O'Brien
18 is?

19 MR. BLACK: I'm going to
20 object. I don't know what the --

21 MR. TISI: That's okay.

22 MR. BLACK: -- basis is here
23 but --

24 MR. TISI: That's okay.

25 MR. BLACK: I'm going to

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1 instruct him not to answer unless I
2 understand the relevance of the questioning.
3 I'll give you a chance you tell me.

4 MR. TISI: These are all -- you
5 don't need to understand, counsel.

6 MR. BLACK: I do, actually.
7 I'm his lawyer.

8 MR. TISI: No, you don't. No,
9 you don't.

10 MR. BLACK: Okay. Well, then
11 don't answer the questions.

12 MR. TISI: Okay.

13 MR. BLACK: That's fine if you
14 don't want to explain it.

15 BY MR. TISI:

16 Q. Do you know who corporate
17 witness -- J&J corporate witness Susan
18 Nicholson is?

19 MR. BLACK: Don't answer that.

20 BY MR. TISI:

21 Q. Do you know who Ed Kuffner is?

22 MR. BLACK: Don't answer that.

23 BY MR. TISI:

24 Q. Have you spoken to any economic
25 modeler in connection with your negotiations

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1 with J&J with respect to the proposed
2 settlement plan?

3 MR. BLACK: Don't answer that.

4 It's privileged.

5 BY MR. TISI:

6 Q. Have you spoken to any
7 gynecologic oncologists with respect to
8 subtypes of ovarian cancer that are related
9 to talc use?

10 MR. BLACK: Don't answer that.

11 It's privileged.

12 BY MR. TISI:

13 Q. Do you know whether or not
14 there's a difference between different types
15 of ovarian cancer and the relationship to
16 talc use?

17 MR. BLACK: Don't answer that.

18 It's privileged, too.

19 BY MR. TISI:

20 Q. Did you ask Mr. Birchfield at
21 any time for any access to experts to find
22 out and investigate the relationship between
23 talc and different types of ovarian cancer?

24 MR. BLACK: Same objection.

25 Don't answer that.

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1 MR. TISI: Okay. I pass the
2 witness. Thank you.

3 MR. BLACK: Thank you, counsel.

4 MR. BLOCK: I had a few
5 follow-ups.

6 MR. SATTERLEY: Jerry, let me
7 do my little follow-up first. Sorry about
8 that.

9 BY MR. SATTERLEY:

10 Q. First off, Mr. Pulaski, you and
11 I have never met before, correct?

12 A. I don't even know who you are.

13 Q. And I don't know who you are
14 either, so I just wanted to make sure.

15 A. No. I don't see a name and I
16 don't see a picture. So I don't --

17 Q. This is Joe Satterley. Can you
18 see me?

19 A. Oh, now you're up. Okay. Now
20 I see you. Sorry. I didn't know who was
21 talking.

22 Q. Sure. No problem.

23 You and I have never met
24 before, correct?

25 A. That is correct.

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1 Q. Okay. The last area of
2 questioning I have real quick is, have you
3 attended a mediation with regards to talc?

4 MR. BLACK: Objection. Don't
5 answer that. Any follow-ups questions have
6 to relate to new testimony.

7 MR. SATTERLEY: Well, you
8 objected for mediation, Mr. Black, so I want
9 to find out if there's actually privilege
10 that's exists, because if he didn't ever
11 attend a mediation, I'm sure the judge wants
12 to know this. Will you not allow him to tell
13 us whether he did a mediation?

14 MR. BLACK: He can answer the
15 question of whether or not he attended a
16 mediation. I'll allow that.

17 MR. SATTERLEY: Thank you.

18 THE WITNESS: No, I have not
19 attended a mediation.

20 BY MR. SATTERLEY:

21 Q. Have you spoken to Ken Feinberg
22 about your talc cases?

23 A. I have not.

24 Q. And have you spoken to Joel
25 Schneider regarding your talc cases?

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1 MR. BLACK: I'm going to cut
2 this off.

3 THE WITNESS: I have not.

4 MR. SATTERLEY: And this is my
5 last question.

6 MR. BLACK: Okay.

7 BY MR. SATTERLEY:

8 Q. Was that a yes or no?

9 MR. BLACK: I think he said
10 "no."

11 THE WITNESS: No.

12 MR. SATTERLEY: Okay. No. All
13 right. Jerry, go ahead. I'm sorry.

14 Thank you, Mr. Pulaski. Sorry
15 we had to ask you these questions on a
16 Saturday morning.

17 THE WITNESS: That's all right.

18 BY MR. BLOCK:

19 Q. Mr. Pulaski, hi. Jerry Block
20 again from Levy Konigsberg. Just a
21 follow-up.

22 You said that you had listed
23 gynecological cancer as the claim type for
24 nearly all of the cases on the list attached
25 to your signed PSA, right?

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1 A. Correct.

2 Q. Okay. What is -- what are
3 gynecological cancers?

4 MR. BLACK: Objection. Look,
5 all of these follow-up questions have to
6 relate to new testimony.

7 MR. BLOCK: What -- okay.

8 MR. BLACK: So I'm going to --
9 objection. Don't answer that.

10 MR. BLOCK: I got your
11 instruction. I'm going to ask another
12 question, okay?

13 MR. BLACK: Okay.

14 BY MR. BLOCK:

15 Q. What are the gynecological
16 cancers that your clients have that are on
17 the list attached to your signed PSA?

18 MR. BLACK: I'm going to object
19 as privileged. I mean, if you guys have the
20 list, then you've got the list.

21 BY MR. BLOCK:

22 Q. Mr. Pulaski, how many of the
23 cases on the list attached to your signed PSA
24 are some gynecological cancer other than
25 ovarian cancer?

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1 MR. BLACK: Same objection.

2 Don't answer.

3 BY MR. BLOCK:

4 Q. Mr. Pulaski, will you tell us
5 anything about the types of gynecological
6 cancers that the people have that are listed
7 on the attachment to your signed PSA?

8 MR. BLACK: He'll answer
9 questions that aren't privileged. That's a
10 privileged question, so don't answer it.

11 MR. BLOCK: Okay. Mr. Pulaski,
12 I -- let's -- we didn't talk about your
13 schedule, but we could do that with your
14 counsel. We don't have to -- or we could do
15 that if everyone is done questioning. I
16 don't know if anyone else --

17 MR. THOMPSON: I've got some.

18 THE COURT REPORTER: Who just
19 said that?

20 MR. THOMPSON: Clay Thompson.
21 Clay Thompson with Maune Raichle.

22 Jerry, are you done?

23 MR. BLOCK: Yes. Well, I'm
24 done subject to getting a court ruling on the
25 objections.

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1 MR. THOMPSON: So by my clock,
2 according to the counsel, we have seven
3 minutes, and I object to this deposition
4 being limited and reserve all right.

5 BY MR. THOMPSON:

6 Q. Mr. Pulaski, my name is Clay
7 Thompson, and I'm at my son's tennis match,
8 but I'm over in the woods away where no one
9 can hear me. That's why I'm looking like
10 this.

11 A. No problem. I'm a big tennis
12 player, so I appreciate that.

13 Q. Sir, you represent plaintiffs
14 with claims against companies for various
15 tort claims generally, right?

16 A. Correct.

17 Q. And you've negotiated
18 settlements on behalf of plaintiffs with
19 claims against companies just generally in
20 your career, right?

21 A. Correct.

22 Q. And you would agree with me,
23 sir, that lawsuits are between parties, not
24 lawyers, meaning that a plaintiff, a sick
25 person making a claim against a company, the

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1 plaintiff is the sick person and the
2 defendant is the company. Those two are the
3 parties to that case. Would you agree with
4 me on that?

5 A. Correct.

6 Q. And the way that you determine
7 a value of a claim between a plaintiff and a
8 defendant in that circumstance, number one
9 could be that the plaintiff and defendant
10 agree to what the value of that claim is.

11 Would you agree with that?

12 A. Is that one way? Is that what
13 you're asking?

14 Q. That's one way. That's one way
15 that that can be done, correct?

16 A. That is correct.

17 Q. And another way that can be
18 done, if the parties are not able to agree on
19 the value of a claim, is that a jury decides
20 what the value of a claim is.

21 Do you agree with that?

22 A. That is correct as well.

23 Q. And, sir, would you agree with
24 me that Johnson & Johnson has the financial
25 wherewithal to settle all claims against it

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1 via agreement of the parties for less -- or
2 I'm sorry. I'll start over.

3 Would you agree with me that
4 Johnson & Johnson is able to pay all claims
5 in full by agreement between parties, between
6 the individual plaintiffs and the defendant,
7 for the next five years?

8 MR. BLACK: Objection. Vague.

9 MR. TORBORG: Objection.

10 MR. BLACK: Foundation.

11 MR. TORBORG: This is
12 Mr. Torborg.

13 BY MR. THOMPSON:

14 Q. You can answer.

15 A. I'm sorry. I apologize, but I
16 really don't understand your question.

17 Q. Do you believe that Johnson &
18 Johnson have sufficient funding to settle, at
19 arm's length, all claims pending against it
20 in the tort system, whether by agreement or
21 by jury verdict, for the next five years?

22 MR. BLACK: Objection.

23 Foundation. Vague.

24 THE WITNESS: If you're asking
25 me whether or not I believe this will be done

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1 in the next five years in the tort system, my
2 answer is no.

3 BY MR. THOMPSON:

4 Q. No. Does Johnson & Johnson
5 have enough money to pay all current
6 plaintiffs, whether it's by settlements with
7 those current plaintiffs or verdicts that
8 those plaintiffs obtain against the company?

9 Does J&J have enough money to
10 resolve all pending claims against them,
11 either by settlement or by verdict, in the
12 next five years? Do they have enough money
13 today to do that?

14 MR. BLACK: Objection.

15 Foundation. Vague. Compound question.

16 THE WITNESS: I believe the
17 answer to that question is it depends on what
18 negotiations there are and what fair value is
19 to different people. I mean, I don't know --
20 if you think \$5 billion a claim is a fair
21 amount, then obviously they don't have enough
22 money to do that so --

23 THE COURT REPORTER: Did you
24 say million or billion in your answer?

25 THE WITNESS: Billion.

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1 BY MR. THOMPSON:

2 Q. Do you believe that Johnson --

3 A. You've asked me a question that
4 doesn't have boundaries.

5 Q. What analysis have you done to
6 determine, if any, whether Johnson & Johnson
7 can settle all current claims against it for
8 less than -- for \$8 billion?

9 MR. BLACK: Objection.

10 Privileged. A couple of minutes left,
11 counsel, obviously subject to whatever the
12 Court decides.

13 BY MR. THOMPSON:

14 Q. Can Johnson & Johnson settle
15 all talc claims against it for less than
16 \$30 billion over the next five years?

17 MR. BLACK: Objection. Calls
18 for a legal conclusion. Foundation.

19 BY MR. THOMPSON:

20 Q. Do you have an opinion on that
21 or anything at all about that?

22 A. If you're asking me whether or
23 not I think Johnson & Johnson is willing to
24 do something or can do something -- I don't
25 understand what you're asking me.

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1 Q. If Johnson & Johnson took
2 \$30 billion out of its piles of cash and said
3 we'd like to settle all the current ovarian
4 cancer and mesothelioma cases against us
5 right now, would that be sufficient to settle
6 all of those cases right now?

7 MR. BLACK: Objection --

8 THE WITNESS: Johnson &
9 Johnson --

10 MR. BLACK: -- foundation, and
11 it calls for a legal opinion. So don't
12 answer it. Better wrap it up.

13 BY MR. THOMPSON:

14 Q. Is Johnson & Johnson
15 financially able to settle or try all claims
16 forever against them? Do you have any
17 opinion on that?

18 MR. BLACK: Same objection.

19 Same objection. You don't need to answer.

20 THE WITNESS: I don't.

21 MR. BLACK: It's -- it's
22 privileged.

23 BY MR. THOMPSON:

24 Q. Have you ever considered
25 Johnson & Johnson's financial ability to pay

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1 all claims in full in the tort system? Has
2 that ever entered into your analysis?

3 MR. BLACK: Same objection.

4 His analysis is privileged. Don't answer it.

5 Guys, we're -- one last
6 question here.

7 MR. TORBORG: Before we go off
8 the record, the debtor needs to make a
9 statement on confidentiality.

10 MR. BLACK: Go ahead.

11 BY MR. THOMPSON:

12 Q. You said that the Third Circuit
13 opinion was a good opinion for your clients,
14 and that was because your clients could
15 proceed in the tort system and get paid in
16 full, right?

17 MR. BLACK: Objection. That's
18 privileged.

19 THE WITNESS: That is not what
20 I said.

21 MR. BLACK: But that's
22 privileged. So, Adam, you don't need to
23 answer.

24 BY MR. THOMPSON:

25 Q. That's why it was a good

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1 result, right, sir?

2 MR. BLACK: All right. So no
3 more questions. We're out of time.

4 MR. THOMPSON: I deserve to
5 come back and ask later. The two hours is an
6 arbitrary limit.

7 MR. BLACK: Counsel, I -- Clay,
8 you and I have never met. I totally respect
9 that request. And if the time limits are
10 modified by the Court, I'll -- we'll be back
11 online subject to Mr. Pulaski's schedule as
12 well. So I'm not trying to be rude. I'm
13 trying to enforce the time limits as I
14 appreciate them. So if the debtor needs to
15 make a statement, that's fine.

16 MR. TORBORG: Yeah, thank you.
17 This is --

18 UNIDENTIFIED SPEAKER: Can I
19 just ask a question of how much time we
20 actually used on the record from the court
21 reporter, please?

22 THE VIDEOGRAPHER: Two hours
23 and two minutes.

24 UNIDENTIFIED SPEAKER: Thank
25 you.

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1 MR. BLACK: I let you guys go a
2 little over.

3 MR. HADDAD: Wow. All right.

4 BY MR. HADDAD:

5 Q. So, listen, before we wrap up,
6 just to make the record clear, Mr. Pulaski,
7 do you adopt each and every instruction from
8 your counsel not to answer?

9 MR. BLACK: Objection. Don't
10 answer that. Come on. My role is to object
11 and instruct him not answer if I think it's
12 appropriate, and he doesn't have to tell you
13 whether he adopts it. He's got a lawyer
14 here --

15 MR. BLOCK: No, no. I think he
16 said --

17 MR. BLACK: That's my job.

18 MR. BLOCK: I think he said --
19 excuse me. This is Jerome Block. I think
20 the witness said throughout the deposition
21 that he would not answer any questions if his
22 attorney instructed him not to answer, and
23 that is exactly what Mr. Pulaski did.

24 MR. BLACK: Whatever he said on
25 the record he said on the record, but no more

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1 questions to Mr. Pulaski.

2 MR. HADDAD: Sure. Well, we're
3 prepared to wrap up for the day, sir. As
4 we've stated throughout the deposition,
5 Mr. Black, your overarching objections and
6 privilege instructions are not well-founded.
7 They've interfered with a proper examination.
8 Our rights are reserved. We do not --

9 MR. BLACK: I understand.

10 MR. HADDAD: We do not consider
11 the examination concluded.

12 MR. BLACK: I understand your
13 positions.

14 MR. TORBORG: This is David
15 Torborg for the debtor. The debtor believes
16 that portions of today's transcripts --
17 transcript constitutes confidential
18 information. Consistent with the parties'
19 agreement, we will identify those portions of
20 the transcript within 24 hours after receipt
21 of the final. Until such time, the entirety
22 of this transcript shall be considered and
23 treated as confidential. Thank you.

24 MR. BLOCK: That's fine. And I
25 would just say, sir, Mr. Torborg, that an

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1 objection on privilege grounds and
2 instruction not to answer, in compliance with
3 an instruction not to answer, cannot possibly
4 be confidential. So I trust you'll be
5 careful and only designate things as
6 confidential that you truly believe in good
7 faith are confidential.

8 MR. SPONDER: And this is Jeff
9 Sponder from the Office of the United States
10 Trustee. And that confidentiality is subject
11 to the Court's ruling yesterday. Thank you.

12 MR. BLACK: Counsel, thank you
13 so much. We'll be available to discuss any
14 changes by the Court regarding scheduling or
15 any other issues.

16 MR. SATTERLEY: Yeah, let me
17 ask that, Mr. Black. When -- can we talk
18 later today? Are you available to talk later
19 today?

20 MR. BLACK: Yes, sir. In fact,
21 if you guys want, my cell phone is 713 --

22 MR. SATTERLEY: Just a second.
23 Let me get a pen. 713 --

24 MR. BLACK: -- 502-8039. Text
25 me, don't call, because I typically don't

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1 answer calls from numbers that aren't stored,
2 but I'll definitely respond quickly.

3 UNIDENTIFIED SPEAKER: Could
4 you give that again? 713 --

5 MR. BLACK: Yes. 713 --

6 UNIDENTIFIED SPEAKER: 502 --

7 MR. BLACK: -- 502-8039.

8 UNIDENTIFIED SPEAKER: Thanks.

9 MR. BLACK: Thank you, counsel.

10 THE VIDEOGRAPHER: May we go
11 off the record?

12 MR. BLACK: Yes.

13 THE VIDEOGRAPHER: Going off
14 the record at 11:45 a.m. Eastern Time. Thank
15 you.

16 (Today's deposition concluded at 11:45 a.m. EDT.)

17 * * * * *

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1 C E R T I F I C A T I O N

2

3 I, Patricia R. Frank, a Registered Merit
4 Reporter, Certified Realtime Reporter, and Notary
5 Public, do hereby certify that I reported the
6 deposition in the above-captioned matter; that said
7 witness was sworn; that the foregoing is a true and
8 correct transcript of the stenographic notes of
9 testimony taken by me in the above-captioned matter.

10 I further certify that I am not an
11 attorney or counsel for any of the parties, nor a
12 relative or employee of any attorney or counsel
13 connected with the action, nor financially
14 interested in the action.

15 
16

17 Patricia R. Frank, CRR, RMR #9764

18

19 Dated: April 16, 2023

20

21

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